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June 30, 2021

VIA ECF

Hon. Mary Kay Vyskocil United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

USDC SDNY	
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Re: <u>United States v. Encarnacion-Velez, et al.</u> (Francia Espinal-Taveras)

21 Cr. 225 (MKV)

Dear Judge Vyskocil,

I represent Francia Espinal-Taveras in the above-captioned matter. I write to request a modification to her conditions of release. Specifically, we request the temporary return (through September 3, 2021) her two daughters' passports so they may spend the summer with family in the Dominican Republic.

The Government does not object to this application. Pre-Trial Services does not take a position on this application, but notes that Ms. Espinal-Taveras is in full compliance with all of the conditions of her release.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Joshua D. Kirshner

cc: All parties (via ECF)

Granted. SO ORDERED.

Date: July 12, 2021 New York, New York

Mary Kay Wskocil Inited States District Judge